

EXHIBIT 1

**DO NOT FORWARD THIS SIDEBAR AGREEMENT
TO THE BOARD OF INDUSTRIAL INSURANCE APPEALS**

**RETURN SIGNED SIDEBAR AGREEMENT TO THE ATTORNEY
GENERAL'S OFFICE**

SIDEBAR AGREEMENT OF PARTIES

BETWEEN

GEO CORRECTIONS & DETENTION, INC.

AND

THE WASHINGTON STATE DEPARTMENT OF LABOR & INDUSTRIES

**Corrective Notice of Redetermination No. 316977552
Board Docket No. 14 W1452**

The DEPARTMENT OF LABOR AND INDUSTRIES (Department) by and through its attorneys, ROBERT W. FERGUSON, Attorney General, and, W. MARTIN NEWMAN, Assistant Attorney General and GEO CORRECTIONS & DETENTION, INC. (Employer) by and through its attorney, JOAN K. MELL, (collectively, Parties), enter into the following Sidebar Agreement of Parties (Sidebar Agreement).

FACTS

On March 11, 2014, the Department initiated an inspection at the Employer's worksite located at 1623 East J. Street, Tacoma, WA 98421-1602. As a result of that inspection, the Department issued Citation & Notice No. 316977552 to the Employer on April 28, 2014, alleging violations of the Washington State Industrial Safety and Health Act (WISHA) assessing \$7,350.00. The Employer filed a timely notice of appeal and the Department reassumed jurisdiction. A Corrective Notice of Redetermination was issued by the Department on June 17, 2014 and the Employer filed a timely notice of appeal to the Board of Industrial Insurance Appeals.

AGREEMENT

The Parties are each aware of the facts and proceedings stated above and have considered these facts in entering into this Sidebar Agreement. The Parties agree as follows:

The Parties will jointly submit a separate Agreement of Parties to the Board requesting the Board issue a final order remanding Corrective Notice of Redetermination No. 316977552 to the Department for further reconsideration.

Following the issuance the Board's Order on Agreement of Parties, the Parties agree that the following will become the final and binding agreement between the Parties relating to Corrective Notice of Redetermination No. 316977552:

1. The Parties agree that the final results related to Corrective Notice of Redetermination No. 316977552 will be \$7,350.00. The Employer promises to pay this amount within 15 days from the date of the Board's Order on Agreement of Parties. Payment check shall reference Corrective Notice of Redetermination No. 316977552 and shall be sent to: ATTN: CASHIER, P.O. Box 44835, Olympia, WA 98504-4835.

2. The Employer promises and agrees that all items in Exhibit A shall be abated within 30 days of issuance of the Board's Order on Agreement of Parties, if not already abated or otherwise extended on Exhibit "A". The Parties agree that abatement has been accomplished as described in Exhibit "B".

3. Employer agrees to post a copy of this Sidebar Agreement at each establishment to which this Sidebar Agreement applies, in a conspicuous place or places where notices to employees are customarily posted, for a period of 10 days before it is returned to the Attorney General's Office. If the signed and posted Sidebar Agreement is not returned to the Attorney General's Office within 30 days from receipt of the Agreement by the Employer, the Sidebar Agreement will become null and void, and the original Corrective Notice of Redetermination No. 316977552 will become the final Department order in this matter.

4. This Sidebar Agreement does not render the Employer immune from future compliance efforts generated by complaints, accident investigations, follow-up inspection protocol, and/or by Division of Occupational Safety and Health's inspection targeting system.

5. Venue to enforce the terms of this Sidebar Agreement will be in Pierce County Superior Court. The prevailing party is entitled to reasonable attorney's fees and costs incurred in any enforcement action.

6. By entering into this Sidebar Agreement, the Department does not admit that it could not have established Corrective Notice of Redetermination No. 316977552 as originally written and the Employer does not admit that its conduct was illegal/in violation of WISHA regulations. Rather, the Parties believe that settlement of Corrective Notice of Redetermination No. 316977552 is in the Parties' best interest in order to avoid the costs and uncertainties in litigation. Nonetheless, nothing shall limit the Department's ability to use the affirmation of the violations contained in this Sidebar Agreement in future proceedings/inspections instituted by the Department under Chapter 49.17 RCW.

7. The Parties agree that no further appeal action will be taken relating to Corrective Notice of Redetermination No. 316977552.


DATED: _____

DATED: 8-31-15

DEPARTMENT OF LABOR AND
INDUSTRIES

GEO CORRECTIONS & DETENTION, INC

W. MARTIN NEWMAN
Assistant Attorney General
WSBA No. 36768



JOANN K. MELL
Attorney for Employer
WSBA No. 21319